

Final Program Review Determination
PRCN #: 200940827013

Appendix A
Program Review Report



June 30, 2010

Dr. David L. Chicoine, President
South Dakota State University
Administrative Lane 0222
Brookings, South Dakota 57007

Certified Mail
Return Receipt Requested
Domestic Return Receipt
7008 0150 0002 0900 8802

RE: **Program Review Report**
OPE ID: 00347100
PRCN: 200940827013

Dear Dr. Chicoine:

From September 22, 2009 through September 24, 2009, Fran Susman, James Moore, and Clifton Knight conducted a review of South Dakota State University's (SDSU) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The review focused solely on SDSU's compliance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act)*. The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by SDSU. The response should include a brief, written narrative for each finding that clearly states SDSU's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, SDSU must provide supporting documentation as required in each finding.

Please note that pursuant to section 498A(b) of the HEA, the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

- a. A written statement addressing the institution's response;
- b. A written statement of the basis for such report or determination; and
- c. A copy of the institution's response.

For purposes of attaching a copy of the institution's response, the Department considers the institution's response to be the written narrative and any supplemental responses. Any supporting documentation submitted with the institution's written response will not be attached to the final program review determination (FPRD), although it will be retained. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and may be provided by the Department to other entities with oversight responsibility over the University after the FPRD is issued.

The institution's response should be sent directly to Fran Susman of this office within 30 calendar days of receipt of this letter.

Record Retention:

Program records relating to the period covered by the program review must be retained until the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Fran Susman at (303) 844-3682 or via e-mail at fran.susman@ed.gov.

Sincerely,



Harry C. Shriver, Jr.
Area Case Director

cc: Timothy Lehman, Chief of Police, SDSU
Cora Olson, Police Department, SDSU
Matt Aschenbrener, Assistant Vice President Student Affairs, SDSU

Enclosure:

Protection of Personally Identifiable Information

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for

South Dakota State University



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID: 00347100

PRCN: 200940827013

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Team - Denver

Program Review Report

June 30, 2010

Table of Contents

	<u>Page</u>
A. Institutional Information.....	2
B. Scope of Review.....	3
C. Findings.....	4
Finding # 1: Failure to Properly Classify and Disclose Crime Statistics..	4
Finding # 2: Inaccurate Reporting of Crime Statistics to the Office Of Postsecondary Education.....	6
Finding # 3: Failure to Report Crimes for Non-campus Buildings/Property.....	10
Finding # 4: Failure to Request Crime Statistics from Local Police for Non-Campus and Adjacent Public Property.....	12
Finding # 5: Failure to Maintain an Open Daily Crime Log in Accordance with Federal Regulations.....	13
Finding # 6: Lack of Adequate Policy Statements.....	14
D. CJIS Quality Assurance Review Report.....	Appendix A
E. Listing of Incident Report Numbers.....	Appendix B

A. Institutional Information

South Dakota State University
Administrative Lane 0222
Brookings, South Dakota 57007

Type: Public

Highest Level of Offering: Master's or Doctor's Degrees

Accrediting Agency: North Central Association of Colleges and Schools

Current Student Enrollment: 12,400 (2008-2009)

% of Students Receiving Title IV: 68% (2008-2009)

**Title IV Participation, Per U.S. Department of Education Data Base
(Postsecondary Education Participants System):**

2007-2008 Award Year

Federal Family Education Loan Program	\$ 43,651,856
Federal Pell Grant Program	\$ 7,180,134
Federal Perkins Loan Program	\$ 1,810,711
Federal Work-Study Program	\$ 626,599
Federal Supplemental Education Opportunity Grant Program	\$ 504,214

FFEL Cohort Default Rate:

2006 – 1.1%
2005 – 1.1%
2004 – 1.0%

Perkins Default Rate:

6/30/2007 – 3.6%
6/30/2006 – 4.4%
6/30/2005 – 2.2%

South Dakota State University (SDSU; the University) is a land-grant institution that offers more than 200 majors, minors, and specializations in seven academic colleges. The SDSU Police Department (SDSUPD) is comprised of 9 full-time officers and 12 part-time student patrol officers. The SDSUPD provides police and emergency services 24 hours a day, 365 days a year. All SDSUPD officers are sworn law enforcement officials, are authorized to carry weapons and make arrests, and have the same authority as municipal police officers. The SDSUPD's jurisdiction covers the SDSU campus, all SDSU property, and the city of Brookings.

B. Scope of Review

The U.S. Department of Education (the Department) conducted a campus security program review at South Dakota State University from September 22, 2009 to September 24, 2009. The review was conducted by Ms. Fran Susman, Mr. James Moore, and Mr. Clifton Knight.

The focus of the review was to evaluate SDSU's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The Clery Act is in Section 485(f) of the Higher Education Act of 1965, as amended (HEA), 20 U.S.C. § 1092(f). The Department's implementing regulations are at 34 C.F.R. §§ 668.41-668.46. SDSU was selected from a sample of institutions of higher education with sworn police departments; the review was not the result of any specific complaint or allegation of non-compliance. The review consisted of an examination of SDSU's catalog and written agreements, police incident reports, arrest records and disciplinary files, as well as policies, practices and procedures related to the Clery Act. The review also included a comparison of the campus statistics submitted by SDSU to the Department and reported to students and employees. Staff interviews of institutional officials with Clery Act responsibilities were also conducted.

The Department's program review coincided with the Quality Assurance Review (QAR) that the Federal Bureau of Investigation (FBI)'s Criminal Justice Information Service (CJIS) Audit Unit conducted at SDSU. The Department is partnering with the CJIS Audit Unit (CAU) to ensure more accurate crime reporting on America's college campuses. The CAU reviews law enforcement agencies' reporting practices and audits crime statistics that are reported by the states through their participation in the Uniform Crime Reporting (UCR) program. The results of the QAR are shared with the Department for a comparative analysis of the annual security report data received from participating institutions. The CAU reviewed a sample of 24 incident reports for Group A Offenses and 45 incident reports for Group B Arrests reported to the SDSUPD during calendar year 2008. The CAU identified one underreported Group A offense, "Theft From Motor Vehicle," that was reported as a Group B arrest for liquor law violations. The arrest number is 121933. Since "Theft From a Motor Vehicle" is not a Clery Act reportable crime and the statistics for liquor law violation arrests are not underreported, no further action is required as it relates to the QAR. A copy of the CJIS report is attached as Appendix A.

The Department reviewed a total of 137 campus police incident reports and disciplinary referral reports from calendar year 2007. The file sample was selected on a judgmental basis from a list of all incidents of crime reported to the SDSU Police Department and/or other campus security authorities and from a listing of all arrests and disciplinary referrals for law violations involving alcohol, illegal drugs, illegal usage of legal controlled substances and weapons during 2007.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning SDSU's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve SDSU of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

While this report reflects initial findings of the Department, they are not final. The Department will issue a Final Program Review Determination Letter at a later date.

C. Findings

During the review, several areas of noncompliance were noted. The Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by SDSU to bring its operations into compliance with federal laws and regulations.

Finding # 1: Failure to Properly Classify and Disclose Crime Statistics

Citation:

Under the Clery Act and the Department's implementing regulations, participating institutions are required to compile and publish statistics concerning the occurrence on campus of the following reported crimes: criminal homicide, manslaughter, forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. In addition, the institution is required to disclose arrests and disciplinary actions related to certain violations of Federal or State drug, liquor and weapons laws. 34 C.F.R. § 668.46(c)(1). The Department's regulations require that, for Clery Act reporting purposes, participating institutions must compile crime statistics using the definitions in 34 CFR Part 668, Subpart D, Appendix A.

Noncompliance:

SDSU failed to properly classify several reported incidents in accordance with the requirements of the Clery Act and the Department's regulations. Specifically, Case # 120400 was improperly classified as a "Simple Assault-Domestic Violence." In this incident, the complainant, a SDSU resident assistant, reported a loud fight in progress at Waneta Hall. The SDSU Police responded and determined that a group of males were involved in an altercation. During the fight, the victim sustained an injury to his nose and reportedly lost consciousness for a period of time following several blows to the head. Further, the report indicated that the person who caused the serious injuries was the aggressor and that the injuries were not caused by mutual combat or horseplay. Based on these facts, the crime should have been classified as an "Aggravated Assault."

Case # 120265 was classified improperly, in relevant part, as “Criminal Entry in to a Motor Vehicle (MV).” In this incident, SDSU Police officers were on routine patrol and observed the suspect attempting to drive off in a white Pontiac. The car appeared to be stuck in the snow and officers assisted the driver. Later in the shift, the same officers returned to the Young Hall parking lot and observed the same individual casing other cars. Subsequent investigation determined that the suspect had broken into at least two cars, removed the personal property of the owners, and had in fact stolen the white Pontiac. Based on the review team’s assessment of the incident report, multiple offenses occurred, not all of which are covered by the Clery Act. At a minimum, SDSU was required to classify the unlawful taking of the white Pontiac as a “Motor Vehicle Theft” and was also required to include the incident in its crime statistics.

Five additional incidents should have been classified as “Burglaries-No Force.” Cases # 120110 (SDSUPD Code: Theft) and 120123 (SDSUPD Code: Stolen Property) both involved the unlawful taking of complainants’ property from their residence hall room during winter break. Neither incident report indicated that a roommate, guest, or other invitee was suspected of the crime. Additionally, Cases # 120525 and 120536 were classified incorrectly as “Grand Theft” and Case # 120536 was improperly classified as “Petty Theft.” In Case # 120525, five hard drives and one global positioning unit were stolen from the offices of the Geographic Information Science Center. Although there were no obvious signs of forced entry, the incident report included a statement by the complainant that, “other offices had been rifled through and drawers had been opened and things in drawers were not in the places they should have been.” In Cases # 120536 and 120537, audio-visual equipment was reported stolen from other offices in Wenona Hall. Both reports were filed on June 27, 2007. In neither case could the complainant state with specificity when the property went missing. Each of these cases should have been coded as a burglary. Each of these classification errors caused SDSU’s crime statistics to be under-reported.

Finally, SDSU could not provide accurate and complete source documents or an audit trail to support its crime, arrest, or disciplinary statistics as published in its Campus Security Report. Please see Finding #2 for more information on this violation and the resultant effect on the accuracy and completeness of the crime statistics submitted to the Department’s Office of Postsecondary Education.

Failure to classify and disclose incidents of crime reported in an accurate and complete manner deprives the campus community of important security information.

Required Action:

SDSU may provide any additional documentation that might change the reportable crime classifications on the crimes discussed above for consideration by the review team. Otherwise, SDSU must correct all errors in its crime statistics. This requirement applies to the exceptions noted above and all other errors that may be identified by SDSU during the preparation of its response. Corrections must be made to the University’s Campus

Security Report and to the online campus security database administered by the Department. Additionally, SDSU must re-examine and improve its policies, procedures, internal controls, and training programs to ensure that all incidents of crime reported to the police or a campus security authority are classified properly and included in the CSR's statistical disclosures. A copy of all new or revised policies and procedures must be submitted with the University's response.

Based on an evaluation of all available information including SDSU's response, the Department will determine if additional actions are appropriate and advise the University accordingly in our Final Program Review Determination letter.

Finding # 2: Inaccurate Reporting of Crime Statistics to the Office of Postsecondary Education

Citation:

All institutions participating in the federal student financial aid programs under Title IV of the HEA are required to make available statistical information relating to certain reported crimes, as well as statistics relating to arrests and/or campus disciplinary referrals for alcohol, drug and illegal weapons possession violations. The statistical information must be disclosed by location – on campus (including a breakdown of those which occurred in dormitories/residential facilities), in or on noncampus buildings or property, and on public property – and must be provided for the three most recent calendar years. The institution must compile the crimes statistics using the definitions of crimes provided in 34 CFR Part 668, Subpart D, Appendix A. 34 C.F.R. § 668.46(a), 668.46(c)(1)-(c)(4)(7).

Noncompliance:

SDSU failed to properly disclose crime statistics for the 2007 calendar year as follows:

- (1) Aggravated Assault: SDSU reported to the Department's Campus Security Web site a total of two aggravated assaults, both of which occurred in residential facilities, for the calendar year 2007. SDSU's annual campus security report on its own Web site and the SDSU annual campus security report in printed form also show a total of two aggravated assaults. The Department's review of the audit trail and incident reports for assaults indicated a total of three aggravated assaults. (See Appendix B for incident report numbers). Below are the reported and actual numbers for Aggravated Assaults for calendar year 2007.
-

	On Campus Property	Residential Facilities*	Non- Campus Properties	Public Property
Reported	2	2	0	0
Actual	2	1	1	0

**Residential Facilities are a subset of On Campus Property*

- (2) Burglary: SDSU reported to the Department's Campus Security Web site a total of seven burglaries that occurred on campus property for calendar year 2007. Of the seven burglaries, three were reported occurring in residential facilities. SDSU's annual campus security report on its own Web site and in printed form revealed a total of eight burglaries (three of which were in residential facilities and one on non-campus property). The Department's review of the audit trail and all incident reports for reported burglaries indicated that there were, in fact, a total of seven burglaries, two of which were in residential facilities and none on non-campus properties. (See Appendix B for incident report numbers). Below are the reported and actual numbers for Burglaries for calendar year 2007.

	On Campus Property	Residential Facilities*	Non- Campus Properties	Public Property
Reported to OPE	7	3	0	0
SDSU Web site	8	3	1	0
Actual	7	2	0	0

**Residential Facilities are a subset of On Campus Property*

- (3) Motor Vehicle Theft: SDSU reported to the Department's Campus Security Web Site a total of two motor vehicle thefts that occurred on adjacent public property for calendar year 2007. SDSU also reported two motor vehicle thefts on its SDSU Web site annual campus security report and on its printed copy. The Department's review of the incident reports for motor vehicle theft indicated there was one motor vehicle theft that occurred on campus property. SDSU's summary chart of campus crime statistics revealed 14 incidents of motor vehicle vandalism, of which two were on adjacent public property. SDSU may have incorrectly treated the two motor vehicle vandalism incidents occurring on adjacent public property as two motor vehicle thefts. In addition, some thefts from or burglaries of motor vehicles may have been classified improperly as motor vehicle thefts. (See Appendix B for incident report numbers. Also see Finding # 1 for information on a Motor Vehicle Theft that was not classified properly). Below are the reported and actual numbers for Motor Vehicle Thefts for calendar year 2007.

	On Campus Property	Residential Facilities*	Non- Campus Properties	Public Property
Reported	0	0	0	2
Actual	1	0	0	0

**Residential Facilities are a subset of On Campus Property*

- (4) Arson: SDSU reported to the Department's Campus Security Web site a total of four arsons for calendar year 2007. SDSU reported a total of three arsons on its SDSU Web site annual campus security report and on its printed copy. The Department's review of the audit trail and incident reports for arson indicated there were a total of four arsons that were correctly reported to the OPE Campus Security Web site but incorrectly reported on the SDSU Web site annual campus security report and the SDSU printed copy of its campus security report. (See Appendix B for incident report numbers). Below are the reported and actual numbers for Arson for calendar year 2007.

	On Campus Property	Residential Facilities*	Non- Campus Properties	Public Property
Reported to OPE	3	2	1	0
SDSU Web site	3	2	0	0
Actual	3	2	1	0

**Residential Facilities are a subset of On Campus Property*

- (5) Drug Law Violations (Arrests): SDSU reported to the Department's Campus Security Web site a total of 31 drug law violations resulting in arrests, of which three were on campus not in residential facilities, 25 on campus in residential facilities, and three on public property. These same numbers were reported on the SDSU Web site annual campus security report and on its printed copy of the annual campus security report. The Department's review of the audit trail and a sample of incident reports for drug law arrests indicated there were a total of 22 drug law arrests. SDSU may have mistakenly included arrests for possession of drug paraphernalia and ingesting when originally reporting drug law arrests for 2007. (See Appendix B for incident report numbers). Below are the reported and actual numbers for Drug Law Violations (Arrests) for calendar year 2007.

	On Campus Property	Residential Facilities*	Non- Campus Properties	Public Property
Reported	28	25	0	3
Actual	19	10	0	3

**Residential Facilities are a subset of On Campus Property*

- (6) Liquor Law Violations (Arrests): SDSU reported to the Department's Campus Security Web site a total of 302 liquor law violations resulting in arrests. These same numbers were reported on the SDSU Web site annual campus security report and on its printed copy of the annual campus security report. The Department reviewed the audit trail and a sample of incident reports for liquor law arrests. It appears that SDSU may have double-counted some arrests as violations of both drug and liquor laws for the same person on the same date. If a person is arrested for multiple violations during a single incident (e.g., violations of both drug and liquor laws), law enforcement discretion should determine which violation should be counted. In addition, violations that are not Clery Act reportable were counted (i.e. driving under the influence).

For example, information in SDSUPD's files indicates that Case #'s 120935 and 120396 included violations of both the drug and alcohol laws. SDSU counted these incidents in both the drug and alcohol arrest statistics. In addition, SDSU reported liquor law arrests that occurred on property that did not meet the definition of adjacent public property or noncampus properties in the Clery Act. (See Case #'s 120287 through 120294.) This resulted in an overstatement of liquor law arrests. The corrected total for liquor law violations resulting in arrests based on the Department's review was 221. (See Appendix B for incident report numbers). Below are the reported and actual numbers for Liquor Law Violations (Arrest) for calendar year 2007.

	On Campus Property	Residential Facilities*	Non- Campus Properties	Public Property
Reported	239	140	3	60
Actual	185	70	1	35

**Residential Facilities are a subset of On Campus Property*

- (7) Disciplinary Actions (Liquor Law Violations): SDSU reported to the Department's Campus Security Web site a total of 397 disciplinary actions for liquor law violations. These same numbers were reported on the SDSU Web site annual campus security report and on its printed copy of the annual campus security report. The Department's review of the audit trail and a sample of incident reports for disciplinary referrals indicated there were a total of 407 disciplinary referrals for liquor law violations. SDSU discovered this discrepancy when preparing the audit trail information for the Department's program review. Below are the reported and actual numbers for Disciplinary Actions (Liquor Law Violations) for calendar year 2007.

	On Campus Property	Residential Facilities*	Noncampus Properties	Public Property
Reported	397	397	0	0
Actual	407	407	0	0

**Residential Facilities are a subset of On Campus Property*

- (8) Headings for Crime Statistics: In addition to the above discrepancies in statistics, the headings for the crime statistics on the SDSU Web site annual campus security report and on its printed copy of the annual campus security report were not in conformity with regulatory requirements. Specifically, the reports included a heading for “Forcible Sex Offenses (Rape)” but failed to include a heading for “Sex Offenses – Non-Forcible”. Even if the resulting statistic is zero, SDSU must include categories for all Clery crimes as required by regulations.

Required Action:

SDSU is required to re-examine and revise its crime statistics. SDSU may provide any additional documentation that might change the reportable crime classifications on the crimes discussed above for consideration by the review team. If SDSU concurs that its published statistics are not accurate, the University must correct its 2007 campus crime statistics on its website and in the Department’s online database. Additionally, SDSU will be required to distribute the modified campus security report to all students and employees.

Finally, SDSU must review and revise its policies and procedures for preparing its campus security report to ensure that crime statistics are properly classified and disclosed on all subsequent campus security reports.

Based on an evaluation of all available information, including SDSU’s response, the Department will determine if additional actions are appropriate and advise the University accordingly in our Final Program Review Determination letter.

Finding 3: Failure to Report Crimes for Non-Campus Buildings/Property

Citation:

An institution must include within its annual campus security report reportable crimes that occur in certain geographical locations associated with the institution. One of those areas is “non-campus buildings or property.” 34 C.F.R. § 668.46(c)(4)

A non-campus building or property is defined as “*any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution’s educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.*” 34 C.F.R. § 668.46(a)

Noncompliance:

SDSU failed to include crime statistics for certain non-campus sites in its campus security report for 2007. Specifically, the review team identified seven properties that are listed as additional locations on SDSU's Eligibility and Certification Approval Report for which crimes were not reported:

OPE ID	Name of Location	Address
00347102	SDPURC	2205 Career Avenue, Sioux Falls, SD
00347103	Capital University Center	809 East Dakota Avenue, Pierre, SD
00347104	West River Graduate Center	501 E. Saint Joseph Street, Rapid City, SD
00347105	West River Program Site	1011 11 th Street, Rapid City, SD
00347107	College of Nursing RN Upward Mobility	225 Rotunda Lane, Brookings, SD
00347109	Gillette	525 West Lake Way Road, Gillette, WY
00347110	Mission	100 East Denver Drive, Mission, SD

Required Action:

SDSU is required to obtain and report crime statistics for any locations that meet the definition of a non-campus building or property in 34 C.F.R. § 668.46(a). If any or all of the locations met the definition of a non-campus building for the calendar years 2006, 2007, and/or 2008, SDSU must attempt to obtain statistics of incidents of crimes reported to local law enforcement as occurring at these locations and disclose such statistics in the manner required by the Clery Act. Specifically, SDSU is required to correct its 2007 campus crime statistics on its website and in the Department's online database. SDSU will be required to distribute the modified campus security report to all students and employees.

In the event that SDSU is unable to obtain statistics for any of these locations for any covered calendar year, SDSU must provide the review team with an explanation and supporting documentation detailing the attempts made to obtain the statistics and the inability to do so.

Finally, SDSU must review and revise its policies and procedures for preparing its campus security report to ensure that crime statistics are gathered and reported for non-campus properties.

SDSU should carefully evaluate the extent to which some additional locations may constitute separate campuses. If a location meets the definition of a campus and is not reasonably contiguous to the main campus then a separate statistical disclosure is required for that location. Please see the Department's "Handbook for Campus Reporting" located at the following website for additional information on this and other Clery Act requirements: www.ed.gov/admins/lead/safety/handbook.pdf

Based on an evaluation of all available information, including SDSU's response, the Department will determine if additional actions are appropriate and advise the University accordingly in our Final Program Review Determination letter.

Finding 4: Failure to Request Crime Statistics from Local Police for Non-Campus and Adjacent Public Property

Citation:

In complying with the statistical reporting requirements, an institution must make a reasonable good faith effort to obtain the required statistics from the local or State police department for any non-campus property and/or adjacent and accessible public property. If the institution makes such a reasonable, good faith effort, it is not responsible for the failure of the local or State police agency to supply such statistics. 34 C.F.R. § 668.46(c)(9)

Noncompliance:

SDSU failed to request crime statistics from the local and/or State police department beginning with the year 2006. Prior to 2006, the Brookings Police Department supplied to SDSU crime statistics for the city of Brookings. SDSU reported all crime statistics for the entire city of Brookings on its campus security report. According to SDSU officials, SDSU was notified by the Department's contractor to no longer report all statistics for the entire city. Due to a misunderstanding, SDSU no longer requested statistics from the local police department after that date. However, SDSU's campus crime statistics reported to the Department reveal the following text:

*"Local Police Crime Statistics
Local statistics are included with the campus's statistics."*

Required Action:

SDSU must make a good faith effort to obtain statistics from the local Brookings Police Department. SDSU must request statistics at least annually for possible inclusion in the

annual campus security report. If the local police department is unable to provide a breakdown of statistics specific to Clery Act geographic areas, SDSU may omit the local police statistics but must provide a statement explaining that local police could not provide a statistical breakdown appropriate for Clery Act reporting. SDSU must revise its campus security report to either include local police department statistics or change the text contained in the campus crime report to "Information not available from local authorities." This change can be made by accessing the OPE Campus Security survey and answering the appropriate screening question.

Based on an evaluation of all available information, including SDSU's response, the Department will determine if additional actions are appropriate and advise the University accordingly in our Final Program Review Determination letter.

Finding #5: Failure to Maintain an Open Daily Crime Log in Accordance with Federal Regulations

Citation:

Institutions with a police or campus security department must maintain "a written, easily understood daily crime log" listing: : 1) any crime that occurred on campus including residence halls; 2) any crime that occurred in a non-campus buildings or on non-campus property; 3) any crime that occurred on public property within the campus or immediately adjacent to and accessible from the campus; or 4) any crime that occurred within the campus police or security department's patrol jurisdiction. This reporting requirement applies to all crimes, not merely those crimes listed in 34 C.F.R. §668.46 (c)(1) and (3) for the Clery Act. The crime log must record crimes by date the crime was reported and must include the nature, date, time, general location, and disposition of each offense. The crime log must be kept up to date and be freely accessible to any requestor. 34 C.F.R. § 668.46 (f)

Noncompliance:

SDSU did not maintain an open daily crime log that met the requirements of the Clery Act during the review period. The SDSU Police maintained a crime log that included substantially more information than that required by the Clery Act but did not maintain a crime log that could be made available to the general public as required by the Department's regulations. SDSU Police did provide crime information and updates to the student press and others upon request. However, this practice does not satisfy the statutory and regulatory standard to maintain a crime log in accordance with the Clery Act requirements. This concern was highlighted in a February 3, 2010 article in the SDSU Collegian. The article entitled, "Access to Crime Logs Denied," alleges that a member of the public who was not associated with the campus press was denied access to the crime log. The news story also asserts that SDSU Police officials stated that only Collegian staff could see the logs even though newspaper staff had been denied access in the past.

Required Action:

SDSU must review and revise its policies, procedures, and internal controls to ensure that all incidents of crime reported as occurring within the patrol jurisdiction are entered on a crime log that can be made available to the public. These revisions must provide for the designation of a capable official to ensure that the crime log is accurately and completely updated in a timely manner and that it is made readily available to the campus community and general public for review upon request. A copy of all revisions must be submitted with SDSU's response to the program review report. Finally, the response must address the allegation raised by the SDSU Collegian in its February 3, 2010 article mentioned above.

Based on an evaluation of all available information including the University's response, the Department will determine if additional actions are appropriate and advise SDSU accordingly in our Final Program Review Determination letter.

Finding #6: Lack of Adequate Policy Statements

Citation:

The Clery Act and the Department's regulations require institutions to include several policy statements in their campus security reports. These disclosures are intended to inform the campus community about the institution's security policies, procedures, programs and the availability of resources and channels to seek recourse. In general, these policies include topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the report itself. Institutions are also required to disclose alcohol and drug policies and educational programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. A notification to students must also be included in the report that advises the campus community that victims of sexual assaults may change their academic or living arrangements, etc. § 485(f) of the HEA; 34 C.F.R. § 668.46 (b)(2)-(b)(12)

Noncompliance:

SDSU's annual campus security report failed to provide all the policy statements required by the Department's regulations. SDSU publishes its annual campus security report on the SDSU Website and also makes available hard copies of the report for any student or employee who requests them. Our review of the current policies and procedures both on the SDSU Web site and in the printed copy reveals the following deficiencies:

- The printed version of SDSU's annual campus security report does not include a list of officials to whom students and employees should report potential crimes. The online version of the report does include such a list. The online list clearly identifies

the title and name of each person, as well as the location of each person, as required by regulation. However, the printed report only provides a list of "Important Phone Numbers", but does not clearly identify to whom potential crimes should be reported. 34 C.F.R. § 668.46(b)(2)(iii)

- SDSU's annual campus security report does not provide a statement that describes the type and frequency of programs designed to inform students and employees about campus security procedures and practices. 34 C.F.R. § 668.46(b)(5)
- SDSU's annual campus security report does not clearly describe programs available to inform students and employees about the prevention of crime. 34 C.F.R. § 668.46(b)(6)
- SDSU's annual campus security report does not provide a description of any drug or alcohol-abuse education programs, as required under section 120(a)-(d) of the Higher Education Act, as amended (HEA). 34 C.F.R. § 668.46(b)(10)

Required Action:

SDSU must revise its annual campus security report to include all required statements of campus security policy, procedures, and programming. SDSU must provide a copy of the revised document with its response. Once the review team has evaluated the statistical and policy changes required in this program review report, the Department will advise SDSU to distribute the modified annual campus security report to all students and employees.

Based on an evaluation of all available information, including SDSU's response, the Department will determine if additional actions are appropriate and advise SDSU accordingly in our Final Program Review Determination letter.



IBR Exit Briefing Local Agency Review

South Dakota State University



Quality Assurance Review

*Shared Management
Shared Responsibility
Shared Success*

A Partnership in Criminal Justice

Table of Contents

Local Agency Review Process	1
Administrative Interview.....	1
Data Quality Review.....	2
Exit Briefing.....	2
Data Quality Classification Results - Group A	3
Data Quality Classification Results - Group B	4
Administrative Interview Results.....	5
Scoring.....	5
Arrests.....	5
Clearances.....	6
Jurisdiction.....	6
Property Values.....	7
Offenders.....	8
Hate Crime.....	8
Law Enforcement Officers Killed or Assaulted (LEOKA).....	9
Updating / Quality Assurance.....	9

Local Agency Review Process

To adequately conduct a state Uniform Crime Reporting (UCR) Program Quality Assurance Review (QAR), the CJIS Audit Unit (CAU) reviews local agencies that contribute to the national Program through their respective state Programs. This helps evaluate the crime reports as they relate to data submission to the national UCR Program via the state UCR Program. The CAU staff contact these agencies through a designated Point of Contact (POC) approximately 45 days prior to the scheduled Review to gather information regarding the flow of reports from the time an incident is reported, to its classification, scoring, and submission to the national UCR Program. During the initial contact call, the auditors discuss logistics pertaining to the on-site Review with the agency POC and make preliminary plans regarding the Review. The CAU staff then follows up with written confirmation of the scheduled QAR to the Chief/Sheriff and UCR POC that will give general information concerning the QAR process.

The local agency QAR consists of three phases:

- Administrative Interview
- Data Quality Review
- Exit Briefing

Administrative Interview

During the administrative interview, CAU staff learn how an agency manages crime reports and whether the data submitted to the national UCR Program comply with national definitions and guidelines or, if not, how the data are converted to national UCR Program standards prior to submission to the national UCR Program.

The interview is based on the agency's policies and procedures concerning the national UCR Program's standards, definitions and information requirements. Topics covered during the interview include:

- Duties and responsibilities of the UCR POC
- Records management system
- Classification and Scoring
- Arrests
- Clearances
- Jurisdiction
- Property Values
- Offenders
- Hate Crime
- Law Enforcement Officers Killed or Assaulted (LEOKA)
- Updating/Quality Assurance
- State Program Services

Data Quality Review

During the data quality review, the CAU staff reviews a predetermined number of Group A and Group B incidents based on a statistical sampling method used at the state level. Record counts are distributed to agencies based on their Return A record counts. Case files, including the officer's narrative and supplemental information, are then compared to data reported to the national UCR Program to determine if the standards and definitions were appropriately applied. The CAU staff then determine if the offenses were appropriately classified into the Group A and Group B offense categories for NIBRS reporting as defined by the national UCR Program. The following error/discrepancy categories are considered when reviewing the incidents for accuracy:

- Overreported - Information reported was not documented in the case file.
- Underreported - Additional information is available in the case file and was not reported.
- Inaccurate – Information reported did not match the case report.

CAU staff compare agency documentation with a NIBRS printout that encompasses the 56 data elements displaying offense, offender, property, victim and arrestee data reported to the national UCR Program.

Overreported, underreported and inaccurate offenses discovered in data element 6 are scored as classification errors when they do not meet the national UCR Program definitions. Other data element discrepancies discovered in the remaining 55 data elements (excluding classification data element 6 errors) are provided for information only to identify systemic technical issues or areas where additional training may be needed.

Classification errors and data element discrepancies are documented for evaluation and discussion with local agency personnel and/or the state UCR Program manager.

Additionally, the CAU staff reviews incidents to ensure Hate Crimes and LEOKA data are reported according to the national standards and definitions for NIBRS.

Exit Briefing

The CAU staff provides an exit briefing packet to the local agency that summarizes the findings based on the administrative interview and the data quality review. The exit briefing packet contains a brief description of all the topics covered during the administrative interview and documents local agency compliance with UCR guidelines. During the exit briefing, the CAU staff will review/discuss each of the classification errors and data element discrepancies with the local agency UCR Point of Contact to verify the auditor's findings. The CAU will answer any questions the agency may have.

Data Quality Classification Results - Group A/B

The data quality portion of this QAR will help assess the state concerning conformance to policy, definitions and information requirements. Requirement One, NIBRS handbook page 2 "The state Program must conform to the national UCR Program's standards definitions and information requirements."

Month(s) Jan- Dec 2008
Reviewed: _____

Total Group A
Offenses Reviewed: 24

Offense / Definition Classification

Indicates data element 6 (UCR Offense Code) scored as classification errors when they do not meet the national UCR Program definitions.

Overreported

Underreported

Inaccurate

Total Group B
Records Reviewed: 45

Total underreported Group A offenses
found in Group B Arrest Reports:

Total Classification Errors:

LEOKA

Overreported

Underreported

Hate Crime

Total Hate
Crime Reviewed: _____

Overreported

Underreported

Inaccurate

Inaccurate
from Data
Element 8A

Administrative Interview Results

The administrative interview portion of this QAR will help assess the state concerning conformance to policy, definitions and information requirements. Requirement One, NIBRS handbook page 2 "The state Program must conform to the national UCR Program's standards definitions and information requirements."

Scoring

1. For counting purposes, the agency:

- a. Counts one offense for each victim of a "Crime Against Persons" (UCR Handbook, NIBRS Edition, 1992, p. 29)

Meets UCR Guidelines

- b. Counts one offense for each distinct operation or attempt for "Crime Against Property" except motor vehicle theft, where one offense is counted for each stolen vehicle. (UCR Handbook, NIBRS Edition, 1992, p.29)

Meets UCR Guidelines

- c. Counts one offense for each "Crime Against Society" (UCR Handbook, NIBRS Edition, 1992, p.29)

Meets UCR Guidelines

Comments:

Arrests

2. "Arrestee data is to be reported for all persons apprehended for the commission of Group A or Group B Crimes (except Justifiable Homicide). The arrestee data to be reported describes the arrestee (e.g., his/her age, sex, race, etc.) and the circumstances of the arrest." (UCR Handbook, NIBRS Edition, 1992, p. 55)

Meets UCR Guidelines

Comments:

Clearances

3. In order to clear an offense by exceptional means, each of the following four conditions must be met:

(UCR Handbook, NIBRS Edition, 1992, p. 34)

1. ☐ "The investigation must have clearly and definitely established the identity of at least one offender."
2. ☐ "Sufficient probable cause must have been developed to support the arrest, charging, and prosecution of the offender."
3. ☐ "The exact location of the offender must be known so that an arrest could be made."
4. ☐ "There must be a reason outside the control of law enforcement which prevents the arrest."

**Agency does not clear by
exceptional means**

4. "The administrative closing of a case or the "clearing" of it by departmental policy does not permit exceptionally clearing an offense." (UCR Handbook, NIBRS Edition, 1992, p. 34))

Meets UCR Guidelines

Comments:

Jurisdiction

5. "To be certain that data is not reported more than once by overlapping jurisdictions:" (UCR Handbook, NIBRS Edition, 1992, p. 6)

- a. "Agencies report only those offenses committed within the . . . boundaries. . ."

Meets UCR Guidelines

- b. "The recovery of property is reported only by the agency that first reported it missing and/or stolen, regardless of who or what agency recovered it." (UCR Handbook, NIBRS Edition, 1992, p. 6).

Meets UCR Guidelines

- c. "Agencies report only those arrests made for offenses committed within their own boundaries/jurisdictions." (UCR Handbook, NIBRS Edition, 1992, p. 6)

Meets UCR Guidelines

Comments:

Property Values

6. "Property information is to be submitted separately for each type of property loss. . ." (UCR Handbook, NIBRS Edition, 1992, p. 41)

Does not meet UCR Guideline

7. Agency considers the following guidelines in the evaluation of property: (UCR Handbook, NIBRS Edition, 1992, p. 43 - 44)

- a. ☐ "Use fair market value..."
- b. ☐ "Use cost to the merchant (wholesale cost)..."
- c. ☐ "Use victim's evaluation..."
- d. ☐ "Use replacement cost or actual cash cost..."
- e. ☐ "When the victim obviously exaggerates the value of stolen/destroyed/damaged property for insurance or other purposes, common sense and good judgment will dictate a fair market value to be placed on the stolen items by law enforcement."

Meets UCR Guidelines

8. "The theft of nonnegotiable instruments such as traveler's checks, personal checks, money orders, stocks, bonds, food stamps, etc., should be scored but no value recorded." (UCR Handbook, NIBRS Edition, 1992, p. 44) "Nonnegotiable instruments, documents requiring further action to become negotiable, e.g., unendorsed checks and unendorsed money orders..." (NIBRS, Volume 1: Data Collection Guidelines, 2000, p. 84)

Does not meet UCR Guideline

9. "If the value is unknown, one dollar (\$1.00) which means unknown, i.e., 1=Unknown should be entered." (NIBRS, Volume 1: Data Collection Guidelines, 2000, p. 86)

Does not meet UCR Guideline

10. "...in order to obtain some measure of the drug problem, the 'estimated quantity' of seized drugs or narcotics is to be reported." (UCR Handbook, NIBRS Edition, 1992, p. 45)

Does not meet UCR Guideline

11. "...when drugs are involved in other types of crime (e.g., they were stolen in a burglary or burned in an arson) their value is to be reported" (UCR Handbook, NIBRS Edition, 1992, p. 43)

Does not meet UCR Guideline

Offenders

12. "Offender data include characteristics (age, sex, and race) of each offender (up to 99) involved in a crime incident whether or not an arrest has been made." (UCR Handbook, NIBRS Edition, 1992, p. 53)

Meets UCR Guidelines

Comments:

Hate Crime

13. "The types of bias to be reported to the FBI's UCR Program are limited to those mandated by the enabling Act and its subsequent amendments, i.e., bias based on race, religion, disability, sexual orientation, or ethnicity." (UCR, Hate Crime Data Collection Guidelines, Revised October 1999, p. 2)

Meets UCR Guidelines

14. "Incidents which do not involve any facts indicating biased motivation on the part of the offender are to be reported as None" (88) (UCR Handbook, NIBRS Edition, 1992, p. 38)

Meets UCR Guidelines

15. "Incidents involving ambiguous facts (i.e., where some facts are present but are not conclusive) are to be reported as Unknown" (99) (UCR Handbook, NIBRS Edition, 1992, p. 38)

Meets UCR Guidelines

Comments:

Law Enforcement Officers Killed or Assaulted (LEOKA)

*Any questions regarding LEOKA, call CSMU 5-4831.
(UCR Handbook, NIBRS Edition, 1992, p. 61 - 65)*

16. "The form entitled 'Law Enforcement Officers Killed or Assaulted' (LEOKA) is to be used by agencies to report line-of-duty felonious or accidental killings of and assaults on sworn law enforcement officers." (UCR Handbook, NIBRS Edition, 1992, p. 61)

Meets UCR Guidelines

17. "Officers Killed" relates to sworn officers with full arrest powers killed in the line of duty. The number of officers slain by felonious acts and those killed by accident or negligence should be entered (on this form, LEOKA)." (UCR Handbook, NIBRS Edition, 1992, p. 61)

Meets UCR Guidelines

18. "All assaults on officers with or without injuries should be included on this form (LEOKA)." (UCR Handbook, NIBRS Edition, 1992, p. 63)

Meets UCR Guidelines

Comments:

Updating / Quality Assurance

19. "Updated information is to be reported to the national program on discovery of an additional unreported offense, victim, and/or offender; a subsequent arrest or exceptional clearance; discovery of a significant amount of unreported property loss; the recovery of stolen property; or the incorrect entry of important data, such as the offense code, the victim's or arrestee's sex or race, etc." (NIBRS Volume 1: Data Collection Guidelines, 2000, p. 18)

Does not meet UCR Guideline

Comments:

Administrative Interview Results

State Program Services

20. Submission frequency:

Monthly

Comments:

Data Element Discrepancy Sheet - Group A

(For information only)

	Overreported	Underreported	Inaccurate	
1. ORI Number	0	0	0	0
2. Incident Number	0	0	0	0
3. Incident Date / Hour	0	0	0	0
4. Cleared Exceptionally	0	0	0	0
5. Ex. Clearance Date	0	0	0	0
7. Attempted / Completed	0	0	7	7
8. Suspected of Using	0	0	0	0
8A. Bias Motivation	0	0	0	0
8. Location Type	0	0	8	8
10. Premises Entered	0	0	0	0
11. Method of Entry	0	0	0	0
12. Criminal Activity	0	0	0	0
13. Weapons / Force	0	0	0	0
14. Property Loss	1	0	6	7
15. Property Description	0	0	0	0
16. Property Value	0	0	0	0
17. Data Recovered	0	0	0	0
18. Stolen MV	0	0	0	0
18. Recovered MV	0	0	0	0
20. Suspected Drug Type	0	0	4	4
21. Est. Drug Quantity	0	0	6	6
22. Drug Measurement	0	0	6	6
23. Victim Number	0	0	0	0
25. Type of Victim	0	0	0	0
25A. Type of Activity	0	0	0	0
25B. Assignment Type	0	0	0	0
25C. MUI Jurisdiction	0	0	0	0
26. Age of Victim	0	0	0	0
27. Sex of Victim	0	0	0	0
28. Race of Victim	0	0	0	0
28. Ethnicity of Victim	0	0	0	0
30. Res. Status of Victim	0	0	0	0
31. Agg. Assault Circum.	0	0	0	0
32. Just. Homic. Circum.	0	0	0	0
33. Type of Injury	0	0	1	1
34. Related Off. Number	0	0	0	0
35. Relationship of Victim	0	0	0	0
36. Offender Number	0	0	0	0
37. Age of Offender	0	0	1	1
38. Sex of Offender	0	0	1	1
39. Race of Offender	0	0	0	0
40. Arrestee Number	0	1	0	1
41. Arrest Number	0	0	0	0
42. Arrest Date	0	0	0	0
43. Type of Arrest	0	0	6	6
44. Multiple Arrest	0	0	0	0
46. Armed With	0	0	0	0
47. Age of Arrestee	0	0	0	0
48. Sex of Arrestee	0	0	0	0
49. Race of Arrestee	0	0	0	0
50. Ethnicity of Arrestee	0	0	0	0
51. Res. Status of Arrestee	0	0	0	0
52. Disposition of Juvenile	0	0	0	0
Totals	1	1	46	

NOTE:

Other data element discrepancies discovered (excluding classification data element 6 errors) are provided for information only to identify systemic technical issues or areas where additional training may be needed.

Overreported and Underreported discrepancies found in data elements 1,14,15,23,34 and 40 would result in additional discrepancies.

Data Element Discrepancy Sheet - Group B

(For information only)

	Overreported	Underreported	Inaccurate	
40. Arrestee Number	0	0	0	0
41. Arrest Number	0	0	0	0
42. Arrest Date	0	0	0	0
43. Type of Arrest	0	0	5	5
45. UCR Arrest Code	0	0	0	0
46. Armed With	0	0	0	0
47. Age of Arrestee	0	0	1	1
48. Sex of Arrestee	0	0	0	0
49. Race of Arrestee	0	0	0	0
50. Ethnicity of Arrestee	0	0	0	0
51. Res. Status of Arrestee	0	0	0	0
52. Disposition of Juvenile	0	0	0	0
Totals	0	0	6	

NOTE:

Other data element discrepancies discovered (excluding classification data element 6 errors) are provided for information only to identify systemic technical issues or areas where additional training may be needed.

Overreported and Underreported discrepancies found in data elements 1,14,15,23,34 and 40 would result in additional discrepancies.

Appendix B Incident Report Numbers

Finding# 2: Failure to Properly Classify and Disclose Crime Statistics

<u>Category</u>	<u>Incident Report Numbers</u>
(1) Aggravated Assault	
• <i>On Campus/Residential</i>	121061
• <i>On Campus/Non-Residential</i>	120783, 120913 (both relate to same assault)
• <i>Noncampus Property</i>	121060
(2) Burglary	
• <i>On Campus/Residential</i>	120280, 120281
• <i>On Campus/Non-Residential</i>	120151, 120269, 120337, 120564, 121002
(3) Motor Vehicle Theft	120994
(4) Arson	
• <i>On Campus/Residential</i>	120092, 120836
• <i>On Campus/Non-Residential</i>	120818
• <i>Noncampus Property</i>	120338
(5) Drug Law Violations (Arrests)	
• <i>On Campus/Residential</i>	120105, 120106, 120362, 120403, 120404, 120420, 120590, 120794, 120995, 121001
• <i>On Campus/Non-Residential</i>	120284, 120285, 120286, 120340, 120341, 120432, 120619, 121039, 121053
• <i>Public Property</i>	120446, 120935, 120936
(6) Liquor Law Violations (Arrests)	
• <i>On Campus/Residential</i>	120101, 120102, 120103, 120104, 120116, 120117, 120118, 120119, 120162, 120163, 120164, 120165, 120166, 120167, 120168, 120175, 120179, 120180, 120181, 120182, 120183, 120184, 120262, 120279, 120311, 120400, 120401, 120421, 120454, 120455, 120456, 120458, 120459, 120462, 120463, 120464, 120465, 120595, 120596, 120597, 120598, 120601, 120621, 120688, 120701, 120706, 120781, 120782, 120843, 120844, 120845, 120853, 120854, 120855, 120856, 120857, 120858, 120859, 120869, 120920, 120921, 120922, 120923, 120924, 120925, 120926, 120933, 120939, 121040, 121056

- *On Campus/Non-Residential* 120120, 120144, 120146, 120201, 120204, 120222, 120223, 120224, 120225, 120241, 120242, 120244, 120245, 120247, 120260, 120261, 120263, 120264, 120307, 120308, 120312, 120328, 120330, 120331, 120332, 120333, 120334, 120366, 120367, 120379, 120399, 120427, 120428, 120433, 120494, 120517, 120518, 120548, 120549, 120591, 120592, 120594, 120614, 120618, 120641, 120653, 120656, 120657, 120659, 120660, 120661, 120663, 120664, 120665, 120668, 120669, 120695, 120696, 120700, 120702, 120719, 120726, 120729, 120730, 120731, 120735, 120736, 120737, 120738, 120741, 120742, 120744, 120745, 120746, 120747, 120748, 120749, 120750, 120751, 120752, 120753, 120760, 120761, 120762, 120768, 120769, 120770, 120780, 120810, 120812, 120846, 120847, 120848, 120881, 120882, 120902, 120904, 120905, 120927, 120931, 120932, 120950, 120951, 120953, 120958, 120959, 120960, 120961, 120975, 120990, 120991, 120992, 121019, 121064, 121068
 - *Noncampus Property* 120697
 - *Public Property* 120096, 120097, 120111, 120148, 120169, 120174, 120259, 120426, 120457, 120492, 120493, 120499, 120521, 120580, 120642, 120643, 120644, 120645, 120725, 120763, 120764, 120765, 120767, 120779, 120809, 120862, 120886, 120906, 120907, 120908, 120909, 120910, 120976, 120977, 120978
-